

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

14-CR-164-WMS

v.

ARI ELIAS BAUM,

Defendant.

NOTICE OF MOTION

MOTION BY:

Brian P. Comerford, Assistant Federal Public Defender.

DATE, TIME & PLACE:

Before the Honorable William M. Skretny, Senior United States District Court Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York, **on the papers**.

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender Brian P. Comerford, dated April 27, 2017.

RELIEF REQUESTED:

Permission to travel for truck driving school.

DATED:

Buffalo, New York, April 27, 2017.

Brian P. Comerford

Brian P. Comerford
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Counsel for Defendant Ari Elias Baum

TO: Frank T. Pimentel
Assistant United States Attorney

Dwayne Palmer
United States Probation Officer

UNITED STATES DISTRICT COURT
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v.

AFFIRMATION

ARI ELIAS BAUM,

Defendant.

BRIAN P. COMERFORD, affirms under penalty of perjury that:

1. I represent the defendant, Ari Baum.

2. Mr. Baum is presently on pretrial release. He respectfully requests that the Court permit him to travel to Missouri to attend Prime Truck Driving School. This is an 8-week job training program that will eventually lead to full-time employment as a truck driver. The primary location for the training is in Springfield, Missouri. Much of the training will involve on-the-road travel. Mr. Baum will provide an itinerary to the Government and Probation for any out-of-state travel.

3. I have discussed this request with Assistant United States Attorney Frank Pimentel and he has indicated that the Government has no objection provided that Mr. Baum submit an itinerary for any out-of-state travel.

4. I have also discussed this request with United States Probation Officer Dwayne Palmer and he has indicated that the Probation Office has no objection subject to Mr. Baum providing additional information about the truck driving company and a detailed itinerary.

5. Mr. Baum has been on release for nearly three years. He is presently attending mental health counseling and is compliant with the conditions of his supervision. We respectfully request that the Court permit Mr. Baum to travel for this job training program. In the event that this job training leads to employment, we will submit a subsequent motion seeking permission for travel related to that employment.

DATED: Buffalo, New York, April 27, 2017.

Respectfully submitted,

/s/ Brian P. Comerford
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